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April 23, 2021

Via Electronic Filing

The Honorable Magistrate Judge Steven Tiscione
U.S. District Court Eastern District of New York
225 Cadman Plaza East
Brooklyn, NY 11201

Re: *Chincha v. Patel*
Case No.: 1:17-cv-06127-ILG-ST

Dear Honorable Judge Tiscione:

This law firm represents Defendant Manojkumar Patel (the “Defendant”) in the above-referenced action. This letter is submitted on consent of Plaintiff.

Pursuant to Rule I(D) of Your Honor’s Individual Motion Practices, this letter respectfully serves as a request to extend the discovery completion deadline from April 30, 2021 to, through and including May 31, 2021. If granted, this request would also necessitate an extension of the deadline for beginning dispositive motion practice from May 31, 2021 to, through and including, June 30, 2021. This request is made on consent of Plaintiff counsel. This is the eighth request of its nature. If granted, this request would not affect any other scheduled deadlines.

The basis for the request is that Plaintiff’s counsel recently informed the undersigned that Plaintiff Carlos Chincha may be deceased. Additional time is needed for Plaintiff’s counsel to confirm, and make any necessary filings, *to wit*, a statement pursuant to Fed.R.Civ.P. 25(a)(3).

Thus, Defendant respectfully requests that the discovery completion deadline of April 30, 2021 be extended to, through and including May 31, 2021, and that the deadline to begin dispositive motion practice be extended from May 31, 2021 to, through and including, June 30, 2021.

Thank you, in advance, for your time and attention.

Respectfully submitted,

LEVIN-EPSTEIN & ASSOCIATES, P.C.

By: /s/ Jason Mizrahi

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